

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARMANDO LOPEZ, BARBIE RODRIGUEZ,
CESAR MELO, DELGADINO ALBERTO and
SANTIAGO DIAZ individually and on behalf of
others similarly situated,

Plaintiffs,

v.

NEW MAJORITY HOLDINGS INC., (d/b/a PAPA
JOHN'S), JOHN DOE 1 CORP., (d/b/a PAPA
JOHN'S on 2119 First Avenue), JOHN DOE 2
CORP., (d/b/a PAPA JOHN'S on 703 Lenox Ave),
JOHN DOE 3 CORP., (d/b/a PAPA JOHN'S on
3477 Broadway) LARRY DOE and RONALD
JOHNSON,

Defendants.

Index No.: 13-cv-02110 (PKC)

NOTICE OF MOTION TO
WITHDRAW AS COUNSEL OF
RECORD

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law and Declaration of Richard M. Garbarini, Garbarini FitzGerald P.C. hereby moves this Court pursuant to Southern District of New York Local Civil Rule 1.4, Garbarini FitzGerald P.C. for Order permitting it to withdraw as counsel of record for Ronald Johnson and New Majority Holdings, Inc. and granting Ronald Johnson 30 days to find new counsel.

Dated: New York, New York
December 15, 2012

Respectfully submitted,

GARBARINI FITZGERALD P.C.

By: /s/ Richard M. Garbarini
Richard M. Garbarini
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New York, New York
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CERTIFICATE OF SERVICE

I certify that on December 15, 2013, a true and correct copy of the foregoing NOTICE OF MOTION TO WITHDRAW, MEMORANDUM OF LAW, PROPOSED ORDER and DECLARATION OF RICHARD M. GARBARINI was served on Joshua Androphy and Michael Falliace of Faillace & Associates P.C. via this Court's ECF system and on Defendants Ronald Johnson and New Majority Holdings, Inc. by e-mail to pjharlem@msn.com and by mailing a true and correct copy to:

Ronald Johnson
New Majority Holdings, Inc.
329 Lenox Avenue
New York, New York 10027

Dated: December 15, 2013

GARBARINI FITZGERALD P.C.

By: /s/ Richard M. Garbarini